

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

*In the Matter of:*

Home Post Office  
Home, Kansas 66438

Docket No. A2012-72

UNITED STATES POSTAL SERVICE COMMENTS REGARDING APPEAL  
(January 10, 2012)

On November 16, 2011, the Postal Regulatory Commission (“Commission”) received an appeal postmarked November 9, 2011, from postal customers Pat and Jim Schramm (“Petitioners Schramm”) objecting to the discontinuance of the Post Office at Home, Kansas (“Home Post Office”).<sup>1</sup> On November 29, 2011, the Commission received another appeal from postal customers Kenneth and Carol Koch (“Petitioners Koch”) who also objected to the discontinuance of the Home Post Office. On November 30, 2011, the Commission received an addendum to the appeal submitted by Petitioners Schramm. On December 1, 2011, the Commission issued Order No. 1016, its Notice and Order Accepting Appeal and Establishing Procedural Schedule, under 39 U.S.C. § 404(d). In accordance with Order No. 1016, the administrative record was also filed with the Commission on December 1, 2011. On December 23, 2011, both Petitions Schramm and Koch filed Participant Statements in support of their appeals. The Following is the Postal Service’s brief in support of its decision to close the Home Post Office.

<sup>1</sup> This discontinuance was conducted pursuant to Handbook PO-101, dated August 2004, and updated with Postal Bulletin revisions through August 2, 2007.

The appeals received by the Commission raise four main issues: (1) the effect on postal services, (2) the impact upon the Home community, (3) the calculation of economic savings expected to result from the discontinuance of the Home Post Office, and (4) the Postal Service's failure to follow procedures required by law. As reflected in the administrative record of this proceeding, the Postal Service gave these issues serious consideration. In addition, consistent with the Postal Service's statutory obligations and Commission precedent,<sup>2</sup> the Postal Service gave consideration to a number of other issues, including the impact upon postal employees. Accordingly, the determination to discontinue the Home Post Office should be affirmed.

### **Background**

The Final Determination to Close the Home Post Office and Establish Rural Route Service ("Final Determination" or "FD"), as well as the administrative record, indicate that the Home Post Office provides EAS-53 level service to no Post Office Box ("P.O. Box") customers, no general delivery customers, and retail customers 20 hours per week.<sup>3</sup> The postmaster of the Home Post Office was promoted on September 28, 1996.<sup>4</sup> Since the postmaster vacancy arose, an

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<sup>2</sup> See 39 U.S.C. §404(d)(2)(A).

<sup>3</sup> FD at 2; Item No. 18, (Form 4920) Post Office Closing or Consolidation Proposal Fact Sheet ("Fact Sheet"), at 1; Item No. 33, Proposal, at 2. The Final Determination can be found at Item 47 in the administrative record. All citations to the Final Determination will be to "FD at \_," rather than to Item 47. The FD page number refers to the pages as marked on the upper left of the document. Other items in the administrative record are referred to as "Item No.\_."

<sup>4</sup> FD at 2; Item No. 18, Form 4290: Fact Sheet, at 1; Item No. 33, Proposal, at 2. The administrative record incorrectly states that the Home Postmaster retired on January 9, 2001. That date represents the retirement of a previous Officer in Charge ("OIC"). Upon further research, it was determined that the Home Postmaster position became vacant when the Postmaster was promoted on September 28, 1996. Regardless, the administrative record continues to reflect that the Home Postmaster position is currently vacant, which was an

Officer in Charge (“OIC”) was installed to operate the office.<sup>5</sup> The non-career postmaster relief (“PMR”) serving as the OIC may be separated from the Postal Service; however, attempts will be made to reassign the employee to a nearby facility.<sup>6</sup> The average number of daily retail window transactions at the Home Post Office is 14, accounting for 15 minutes of workload daily.<sup>7</sup> Over the last three years revenue has been low: \$14,693 in FY 2008 (38 revenue units); \$15,610 in FY 2009 (41 revenue units); and \$14,306 in FY 2010 (37 revenue units).<sup>8</sup>

Upon implementation of the Final Determination, retail services will be provided by rural route service under the administrative responsibility of the Post Office in Marysville, Kansas<sup>9</sup> (“Marysville Post Office”); an EAS-18 level office located 7 miles away, which has 328 available Post Office Boxes.<sup>10</sup> These services will continue after the implementation of the Final Determination.<sup>11</sup>

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appropriate basis for commencing a discontinuance study under Handbook PO-101.

<sup>5</sup> FD at 7; Item No. 33, Proposal, at 8.

<sup>6</sup> FD at 9; Item No. 33, Proposal, at 8.

<sup>7</sup> FD at 2; Item No. 33, Proposal, at 2. The Petitioner raises concerns about the timing of the retail transaction survey, citing winter weather as a “slow period” for retail activity. According to Item 10, Window Transaction Survey, at 1, the survey was scheduled to be conducted from February 26, 2011 to March 11, 2011. The Survey is just a snapshot at a point in time. Sometimes the survey will reflect normal activity, and sometimes it may reflect conditions that affect business traffic, such as extremes in weather or community events that can suppress or increase the retail transaction figure. In any event, the daily number of transactions is not the sole factor informing the determination to close the Home Post Office; it is merely one of many facts considered.

<sup>8</sup> FD at 2; Item No. 33, Proposal, at 2.

<sup>9</sup> The Marysville Post Office will be the administrative office for the Home Post Office. The Marysville Post Office is not a candidate facility within the Retail Access Optimization Initiative (RAOI). See Docket No. N2011-1, USPS LR-N2011-1/11 Rev, at <http://www.prc.gov/prc-pages/library/detail.aspx?docketId=N2011-1&docketPart=Documents&docid=75971&docType=Library%20References&attrID=&attrName=>

<sup>10</sup> FD at 2; Item No. 33, Proposal, at 2. It is important to note that rural route service to mailboxes along the carrier’s line of travel is already available to the residents of Home, KS. This service is currently administered by the Marysville Post Office.

<sup>11</sup> FD at 2.

The Postal Service followed the proper procedures that led to the posting of the Final Determination. All issues raised by the customers of the Home Post Office were considered and properly addressed by the Postal Service. The Postal Service complied with all notice requirements. In addition to the posting of the Proposal and Final Determination, customers received notice through other means. Questionnaires were distributed to all residents within the 66438 ZIP Code. Questionnaires were also available over the counter at the Home Post Office.<sup>12</sup> A letter from the Manager of Post Office Operations, Omaha, Nebraska, was also made available to postal customers.<sup>13</sup> This letter advised customers that the Postal Service was evaluating whether the continued operation of the Home Post Office was warranted, and that effective and regular service could be provided through rural route delivery and retail services provided by the Marysville Post Office.<sup>14</sup> The letter invited customers to express their opinions about the service they were receiving and the effects of a possible change in the way postal services were provided.<sup>15</sup> Fifty one customers returned questionnaires, and the Postal Service responded.<sup>16</sup> In addition, on April 7, 2011, representatives from the Postal Service were available at Blue Valley Telecommunications' lower level meeting room, in Home, KS, for a community meeting to answer questions and provide information to customers.<sup>17</sup> Customers received formal notice of the Proposal and Final Determination through postings

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<sup>12</sup> FD at 2; Item No. 20, Questionnaire Instruction Letter from P.O. Review Coordinator to OIC/Postmaster at Home Post Office, at 1.

<sup>13</sup> Item No. 21, Questionnaire Cover Letter.

<sup>14</sup> Id.

<sup>15</sup> Id.

<sup>16</sup> See *Generally*, Item No. 22, Returned Customer Questionnaires and Response Letters; Item No. 23, Analysis of Questionnaires.

<sup>17</sup> Item No. 24, Community Meeting Roster.

at the Home and Marysville Post Offices. The Proposal was posted with an invitation for public comment at these two Post Offices for sixty days, beginning on July 20, 2011.<sup>18</sup> Three responses were received after the proposal was posted.<sup>19</sup> The Postal Service responded to those concerns.<sup>20</sup> The Final Determination was posted at the Home and Marysville Post Offices starting on October 17, 2011 as confirmed by the round-date stamped Final Determination cover sheets that appear in the administrative record.<sup>21</sup>

In light of a postmaster vacancy;<sup>22</sup> minimal workload;<sup>23</sup> low office revenue;<sup>24</sup> the variety of delivery and retail options (including the convenience of retail services provided by rural route delivery);<sup>25</sup> no projected growth in the area;<sup>26</sup> minimal impact upon the community;<sup>27</sup> and the expected financial savings,<sup>28</sup> the Postal Service issued the Final Determination.<sup>29</sup> Regular and effective postal services will continue to be provided to the Home community in a cost-effective manner upon implementation of the Final Determination.

Each of the issues raised by the Petitioner is addressed in the paragraphs which follow.

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<sup>18</sup> Item No. 36, Round-dated Proposals and Invitation.

<sup>19</sup> See *Generally*, Item No. 38, Proposal Comments and USPS Response Letters; Item No. 40, Analysis of 60-Day Comments.

<sup>20</sup> *Id.*

<sup>21</sup> Item No. 49, Round-date Stamped Final Determination Cover Sheets, at 1-2. The removal stamp for the Marysville Post Office is not included in the Administrative Record, because the Final Determination is still currently posted.

<sup>22</sup> FD at 2; Item No. 18, Form 4920: Fact Sheet, at 1; Item No. 33, Proposal, at 2.

<sup>23</sup> FD at 2; Item No. 33, Proposal, at 2.

<sup>24</sup> Item No. 18, Form 4920: Fact Sheet.

<sup>25</sup> FD at 2; Item No. 33, Proposal, at 2.

<sup>26</sup> Item No. 16, Community Survey Sheet;

<sup>27</sup> FD at 2; Item No. 33, Proposal, at 2.

<sup>28</sup> FD at 7-8; Item No. 33, Proposal, at 8.

<sup>29</sup> FD at 2-9.

## Effect on Postal Services

Consistent with the mandate in 39 U.S.C. § 404(d)(2)(A)(iii) and as addressed throughout the administrative record, the Postal Service considered the effect of closing the Home Post Office on postal services provided to Home customers.<sup>30</sup> The closing is premised upon providing regular and effective postal services to the customers of the Home Post Office.

Petitioners Koch, in their letter of appeal, raise concerns about whether rural carriers will be equipped to provide the same retail services available at the Home Post Office. In Particular, Petitioners Koch question whether the rural carrier will be able to handle requests that mail be held, and whether local business owners will be forced to travel to nearby post offices to conduct retail transactions. The Postal Service explained that upon the implementation of the Final Determination, many retail services currently provided at the Home Post Office will be provided by rural route service already administered by the Marysville Post Office.<sup>31</sup> In fact, most transactions do not require the customer to meet the rural carrier at the mailbox, thus alleviating the need to travel to the post office for most retail services. Stamps by mail, money order application forms, special services such as certified mail, and requests that mail be held, will be available from the carrier.<sup>32</sup> In addition, non-postal services currently

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<sup>30</sup> FD at 2-9; Item No. 33, Proposal, at 2-8.

<sup>31</sup> FD at 3; Item No. 33, Proposal, at 3.

<sup>32</sup> FD at 3-4; Item No. 33, Proposal, at 3-4.

provided by the Home Post Office can be provided by the Marysville Post Office, which is located 7 miles away.<sup>33</sup>

Petitioners Koch also raise security concerns associated with leaving money in the mailbox. The Postal Service explained that residents may leave a note in the mailbox asking the carrier to sound their horn when they arrive at the mailbox, and then meet the carrier to transact business.<sup>34</sup> The Postal Service also queried the Postal Inspection Service concerning incidents of mail theft and vandalism in the area surrounding the Home Post Office. Postal Inspection Service records indicate that there has only been 1 report of vandalism or theft in the area.<sup>35</sup>

Finally, Petitioners Koch raise concerns about the effect of rural carrier service on the delivery time of the mail. Specifically, Petitioners Koch question whether the carrier will be able to arrive at the mailbox around the same time each day. The Postal Service explained that rural carriers are required to serve their routes expeditiously and arrive at mailboxes around the same time each day.<sup>36</sup> The Postal Service also noted that rural carriers currently provide consistent and reliable service to hundreds of communities across the country each day.<sup>37</sup>

The Postal Service has considered the impact of closing the Home Post Office upon the provision of postal services to Home customers. Rural route delivery to mailboxes installed along the carrier's line of travel provides similar

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<sup>33</sup> FD at 2; Item No., 33, Proposal, at 2.

<sup>34</sup> FD at 2; Item No., 33, Proposal, at 2.

<sup>35</sup> Item No 14, Local Law Enforcement Vandalism Reports.

<sup>36</sup> FD at 3; Item No., 33, Proposal, at 3.

<sup>37</sup> Id.

access to retail services, thereby alleviating the need to travel to the Post Office for most transactions.<sup>38</sup> Thus, the Postal Service properly concluded that all Home customers will continue to receive regular and effective postal services.

### **Effect Upon the Home Community**

Consistent with the mandate in 39 U.S.C. § 404(d) (2) (A) (i), the Postal Service considered the effect of its decision to close the Home Post Office on the Home community. While the primary purpose of the Postal Service is to provide postal services, the statute recognizes the substantial role that local Post Offices play in community affairs, and requires consideration of that role whenever the Postal Service proposes to close or consolidate a Post Office.

Home is an unincorporated community located in Marshall County, Kansas. The Marshall County Sheriff's department provides police protection. The community is administered politically by Marshall County, with fire protection provided by the Home Volunteer Fire Department. The questionnaires completed by Home customers indicate that, in general, retirees, self-employed, commuters, and others who reside in Home must travel elsewhere for other supplies and services.<sup>39</sup>

In their letter of appeal, Petitioners Koch raise several issues concerning the effect of the closing of the Home Post Office upon the Home Community. These issues were extensively considered by the Postal Service, as reflected in

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<sup>38</sup> FD at 9; Item No., 33, Proposal, at 8.

<sup>39</sup> See *Generally*, Item No. 22, Returned Customer Questionnaires and Response Letters.



the administrative record.<sup>40</sup> In particular, Petitioners Koch note that the Home Post Office is a community meeting place and that its loss will negatively impact the community's identity. The Postal Service explained that a community's identity derives from the interest and vitality of its residents and their use of its name.<sup>41</sup> The Postal Service is helping to preserve community identity by continuing to use the community name and ZIP Code in addresses.<sup>42</sup>

Petitioners Koch also raise concerns about the effect of the closing of the Home Post Office on local businesses. The Postal Service explained that most businesses do not depend on the location of a Post Office, but on the provision of regular and effective postal services.<sup>43</sup> Given that minimal population growth is expected in the Community,<sup>44</sup> the Postal Service concluded that carrier service is adequate to support the existing business community and support future growth.<sup>45</sup> In addition, the Postal Service explained that responses to questionnaires sent to Home customers revealed that customers will continue to use local businesses if the Post Office closes.<sup>46</sup>

Thus, the Postal Service has met its burden, as set forth in 39 U.S.C. § 404(d) (2) (A) (i), by considering the effect of closing the Home Post Office on the Home Community.

### **Economic Savings**

Postal officials also properly considered the economic savings that would

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<sup>40</sup> FD at 6-7; Item No. 33, Proposal, at 6-7.

<sup>41</sup> Id.

<sup>42</sup> Id.

<sup>43</sup> FD at 7.

<sup>44</sup> Item No. 16, Community Survey Sheet.

<sup>45</sup> FD at 7.

<sup>46</sup> FD at 7; Item No. 33, Proposal, at 6.

result from the proposed closing, as provided under 39 U.S.C. § 404(d) (2) (A) (iv). The Postal Service estimates that rural route service would cost the Postal Service substantially less than maintaining the Home Post Office while continuing to provide regular and effective service.<sup>47</sup> The estimated annual savings associated with discontinuing the Home Post Office are \$25,042.<sup>48</sup>

In their letters of appeal, both Petitioners Koch and Petitioners Schramm question the calculation of the estimated annual savings. The Postal Service appropriately applied its standard financial analysis when calculating the estimated savings. This analysis takes into account the postmaster's annual salary and benefits, annual lease costs, and the annual costs of replacement service.<sup>49</sup> When calculating the cost of replacement services, the Postal Service considers the following cost drivers: the number of additional boxes to be added to the rural route; the additional volume that may be expected per additional box; the number of additional miles to be added to the route; and the total additional annual hours that will be required to service the route.<sup>50</sup> Since the Home Post Office does not currently serve any delivery or P.O. Box customers, the Postal Service correctly concluded that no additional costs would be incurred to extend carrier service.<sup>51</sup> The Postal Service's approach is both defensible and reasonable: moreover it is efficient while adding comparability across discontinuance studies.

The Petitioners also state that the numbers used for the salary figure of

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<sup>47</sup> Item No. 21, Questionnaire Cover Letter.

<sup>48</sup> FD at 7-8; Item No. 33, Proposal, at 8.

<sup>49</sup> Id.

<sup>50</sup> Item No. 17, Alternate Service Options/Cost Analysis.

<sup>51</sup> FD at 7-8; Item No. 17, Alternate Service Options/Cost Analysis; Item No. 33, Proposal, at 8.

the Postmaster are incorrect. Petitioners contend that if the Postal Service used the actual wages paid to the OIC instead of the salary for a Postmaster, the financial savings would be significantly less. However, the economic savings calculation conducted as a part of a discontinuance study is forward-looking; that the Postal Service may have paid less in salary and benefits in previous years does not mean that it could count on those savings in the future. If the Home Post Office closes, one career position will be eliminated. If the Post Office is not discontinued, the Postmaster position would have been filled, and the salary and benefits to be paid would be those used in the economic savings estimate.

In addition, Petitioners Koch allude to the statutory authority in Title 39, requiring that no small Post Office may be closed solely for operating at a deficit.<sup>52</sup> When determining whether to close a Post Office, the Postal Service must consider whether such a closing is consistent with the policy that the Postal Service provide “a maximum degree of effective and regular postal services to rural areas, communities, and small towns where post offices are not self-sustaining.”<sup>53</sup> While the Postal Service analyzed the Home Post Office’s workload and revenues,<sup>54</sup> this analysis was not conducted in isolation. The Postal Service considered a variety of other factors including, a postmaster vacancy, minimal workload, declining office revenue, the variety of delivery and retail options (including the convenience of rural delivery and retail service), very little projected growth in the area, minimal impact upon the community, and the

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<sup>52</sup> See 39 U.S.C. § 101(b)

<sup>53</sup> See 39 U.S.C. § 404(d)(2)(A)(iii).

<sup>54</sup> Item No. 10, Window Transaction Survey, at 1-2; Item No. 18, Form 4920: Fact Sheet.

expected financial savings.<sup>55</sup> Further, the consideration of an office's workload and revenue is not inconsistent with the policies of Title 39, since such analysis does not imply that a small Post Office is operating at a deficit. After giving consideration to the above mentioned factors, the Postal Service properly determined that, in the absence of a post office, a maximum degree of effective and regular postal services could be provided to the Home community with rural route service.

Finally, the Petitioners question the exclusion of postage revenues generated by the only permit/meter customer, Blue Valley Telecommunications, from the Home Post Office's annual revenue calculations. Petitioners contend that if such proceeds were credited to the Home Post Office, annual revenues would exceed \$50,000. However, as the Postal Service explained, only retail transactions are counted when evaluating the annual revenues of any postal installation.<sup>56</sup> Accordingly, the Postal Service correctly applied its standard approach to calculating the annual revenues of the Home Post Office. Since revenue from permit/meter customers is not typically accepted across the retail counter,<sup>57</sup> such revenues are not necessarily tied to any particular postal installation's location. Moreover, attributing a permit/meter customer's revenues to a particular Post Office would distort the portrait of an office's retail activities, thereby constraining any cross-facility comparison of the business activity at the installation being reviewed.

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<sup>55</sup> FD at 2-9; Item No. 33, Proposal at 2-8.

<sup>56</sup> Item No. 40, Analysis of 60-day Posting Comments. The Commission learned during Retail Access Optimization, PRC Docket N2011-1, that the Postal Service utilizes a single definition of retail revenue that extends across all facilities.

<sup>57</sup> Revenues from permit/meter customers are typically accepted through Bulk Mail Entry Units, carriers, or Postal Service drop boxes.

In conclusion, the Postal Service determined that carrier service is more cost-effective than maintaining the Home Post Office and Postmaster position.<sup>58</sup> The Postal Service's estimates are supported by record evidence, in accordance with the Postal Service's statutory obligations. The Postal Service has therefore complied with its statutory obligations and Commission precedent.<sup>59</sup>

### **Procedural Issues**

Consistent with the mandate in 39 U.S.C. § 404(d) (5) (B), the Postal Service followed all procedures required by law when evaluating the Home Post Office for discontinuance. In their letters of appeal, both Petitioners Koch and Schramm assert that the Postal Service failed to provide the customers of the Home Post Office with adequate representation at a community meeting. Specifically, Petitioners claim that Section 253 of Postal Handbook PO-101<sup>60</sup> required the Postal Service to have a District Manager or Manager of Post Office Operations ("MPOO") conduct community meetings. While the Petitioners correctly cite the latest version of Handbook PO-101, the community meeting held for the discontinuance of the Home Post Office was conducted under a prior version of this handbook.<sup>61</sup> Under the prior version of Handbook PO-101, Section 264 only requires that the employees conducting the community meeting be "knowledgeable about community needs and available alternate services." Since the Petitioners do not allege that the postal employees who conducted the

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<sup>58</sup> FD at 7-9: Item No. 33, Proposal, at 8.

<sup>59</sup> See 39 U.S.C. § 404 (d) (2) (A) (iv).

<sup>60</sup> Handbook PO-101, dated July 2011, and updated with Postal Bulletin revisions through December 1, 2011.

<sup>61</sup> *Supra* note 1

meeting were unknowledgeable about community needs or alternate services, the Postal Service appropriately followed the procedures required by law. In any event, practical realities may require that more senior officials delegate responsibility for chairing community meetings.

### **Effect on Employees**

As documented in the record, the impact on postal employees is minimal. The Postmaster was promoted on September 28, 1996. A non-career employee was installed as the temporary officer-in-charge (OIC). Upon implementation of the final determination, the OIC may be separated from the Postal Service; however, attempts will be made to reassign the employee to a nearby postal facility. The record shows that no other employee will be affected by this closing.<sup>62</sup> Therefore, in making the determination, the Postal Service considered the effect of the closing on employees at the Home Post Office, consistent with its statutory obligations.<sup>63</sup>

### **Other Matters**

In their letters of appeal, Both Petitioners Koch and Schramm assert that the administrative record misstates several facts. In Particular, the Petitioners assert that the administrative record misstates the service hours of the Marysville Post Office, the date that the Home Postmaster retired, and that the Home Post Office is not handicap accessible. Petitioners allude to the fact that the Postal Service may have improperly reached its Final Determination to close the Home Post Office by considering these factors. Petitioners' assertions may be easily

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<sup>62</sup> FD at 7; Item No. 33, Proposal, at 8.

<sup>63</sup> See 39 U.S.C. § 404 (d) (2) (A) (ii).

set aside. With respect to the Home Post Office not being handicap accessible and the retirement date of the Postmaster, the Postal Service apologized for the errors in the record.<sup>64</sup> Furthermore, the Postal Service's decision was not influenced by these factors. Instead, the Postal Service based its Final Determination on a variety of factors including, a postmaster vacancy, minimal workload, declining office revenue, the variety of delivery and retail options available, no projected growth in the area, minimal impact upon the community, and the expected financial savings.<sup>65</sup> In sum, the Final Determination is sound.

### **Conclusion**

As reflected throughout the Administrative Record, the Postal Service has followed the proper procedures and carefully considered The effect of closing the Home Post Office on the provision of postal services and on the Home community, as well as the economic savings that would result from the proposed closing, the effect on postal employees, and other factors, consistent with the mandate of 39 U.S.C. § 404(d) (2) (A).

After taking all factors into consideration, the Postal Service determined that the advantages of discontinuance outweigh the disadvantages. In addition, the Postal Service concluded that after the discontinuance, the Postal Service will continue to provide effective and regular service to Home customers.<sup>66</sup> The Postal Service respectfully submits that this conclusion is consistent with and

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<sup>64</sup> Item No. 40, Analysis of 60-day Posting Comments. In addition, these misstatements have been corrected in the administrative record through a memorandum filed with the Commission on January 10, 2012. This memorandum was filed with the Commission under separate cover.

<sup>65</sup> FD at 2-9; Item No. 33, Proposal at 2-8.

<sup>66</sup> FD at 9.

supported by the administrative record and is in accord with the policies stated in 39 U.S.C. § 404(d)(2)(A). The Postal Service's decision to close the Home Post Office should, accordingly, be affirmed.

The Postal Service respectfully requests that the determination to close the Home Post Office be affirmed.

Respectfully submitted,

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